



FINANCIAL YEAR
2022

Modern Slavery Statement

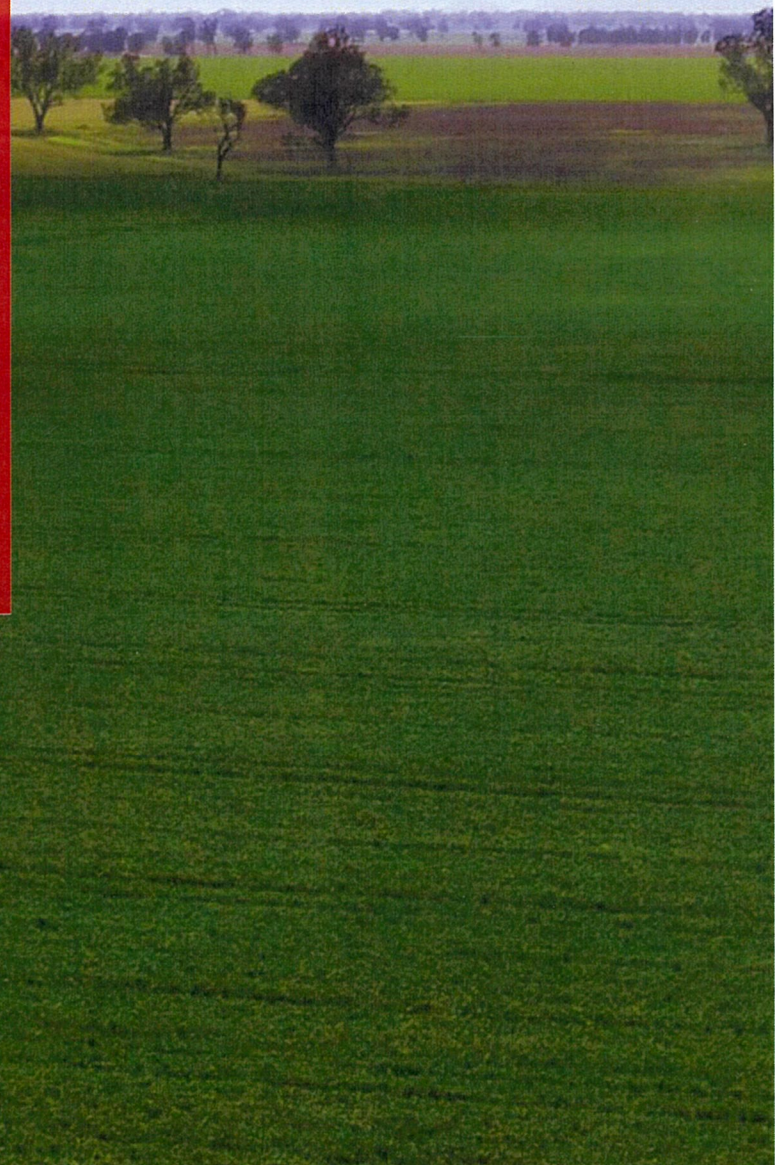
Ameropa Australia Pty Ltd

ACN 009 504 394

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Ameropa Australia Pty Ltd ACN 009 504 394
- Modern Slavery Statement



Introduction

Ameropa Australia Pty Ltd (trading as Impact Fertilisers and Brown's Fertilisers) is committed to Corporate social responsibility and to acting ethically and with integrity in all our business dealings and relationships; and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

This Statement sets out all the steps and measures we are putting in place to reach this goal.

Jim Mole
Chief Executive Officer



Ameropa Australia Pty Ltd ACN 009 504 394

Modern Slavery Statement

This statement is made in accordance with the requirements under the *Modern Slavery Act 2018* (Cth) (**Act**). This statement addresses and assesses modern slavery risks in the operations and supply chain of Ameropa Australia Pty Ltd (ACN 009 504 394) ("**Ameropa**", "**us**", "**we**" or "**our**") during the 2022 financial year (which ended on 31 December 2022).

Ameropa is a privately held company incorporated in Australia and registered in Tasmania, Australia. This statement is made on behalf of Ameropa Australia Pty Ltd (ACN 009 504 394) as the reporting entity. We do not own or control any other entities.

Criteria required under the Act	Page reference in this statement
<i>Identify the reporting entity</i>	4
<i>Describe the reporting entity's structure, operations, and supply chain</i>	4-5
<i>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns and controls</i>	8
<i>Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes</i>	11
<i>Describe how the reporting entity assesses the effectiveness of these actions</i>	13
<i>Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)</i>	14

Our Structure, Operations and Supply Chains

Ameropa is a wholly owned subsidiary of Ameropa Trade Holding AG, and part of the Ameropa Group, a global business with its Head Office located in Binningen, Switzerland.

Ameropa Group is a privately owned international agribusiness, specialising in the trading and distribution of fertiliser, food, and feed products.

Ameropa distributes fertiliser products within Australia through its brands 'Impact Fertilisers' and 'Brown's Fertilisers'.

Impact Fertilisers

Impact Fertilisers is a wholesale distribution business, which sells its products and services through an extensive dealer network in Eastern Australia. There are nine Impact Fertilisers' distribution depots on the mainland of Australia and seven depots in Tasmania, providing a convenient dispatch footprint for wholesale customers. Our infrastructure also includes a Single Super Phosphate manufacturing plant in Hobart, Tasmania.

Impact Fertilisers supplies dealers with a wide range of quality fertiliser products that the dealers on-sell to Australian growers. Our products include Urea, Single Super Phosphate, Mono-Ammonium Phosphate, Di- Ammonium Phosphate, Muriate of Potash, and Sulphate of Ammonium, together with a range of specialty products designed to improve farming productivity even further such as: ZincStar®, and N-Protect®.

Impact Fertilisers offers blending services and can provide product as bulk or bagged, depending on the depot of dispatch.

Brown's Fertilisers

Brown's Fertilisers (**Brown's**) is a retail and fertiliser spreading business. Brown's has been operating in North East Victoria and the South and West Gippsland areas for over 35 years. Brown's has three depots across Gippsland, a depot in Northeast Victoria and their own small fleet of trucks.

Services include soil testing and agronomy; fertiliser and lime spreading; compost and manure spreading; fertiliser bins; bulk and 25kg bags and bulk cartage.

The Company

Ameropa currently has 191 employees, with approximately 38 based at the Melbourne Head Office.

In the 2022 financial year, Ameropa engaged directly with more than 1284 suppliers from over 10 countries. Many of the purchases from such suppliers were of a one-off nature with approx. 822 of these suppliers being utilised for a low value of \$10,000 or less.

Ameropa's largest category of spending was on fertiliser.

The supply chain of products and services that contribute to our operations include:

- Sourcing raw materials from overseas and shipping those products to Australia;
- Unloading product from ships and storing it;
- Wholesale and retail distribution of products;
- Distributing products to customers;
- Manufacturing products; and
- Agronomy and spreading services.

Key Areas of Focus in 2022

Ameropa continues to develop and enhance its policies and processes which aim to protect human rights and reduce the risk of modern slavery in its operations and supply chain. It has placed much emphasis on this area of corporate responsibility since the introduction of the Act.

Key Initiatives in the 2022 financial year:

1. Supplier Code of Conduct

Ameropa consistently monitors and reviews its Supplier Code of Conduct (**Code**) to ensure that we approach our responsibilities in an appropriate, contemporaneous, and agile manner. The Code defines how we do business and demonstrates our commitment to corporate social responsibility. In support of this commitment, the Code sets out the ethical standards we expect, the level of integrity required in our business dealings and additional human rights requirements including a zero-tolerance approach towards modern slavery. In turn, we expect all our suppliers to share the commitment to meeting these standards and values.

We provide the Code (and communicate our expectations around compliance with the Code) to all new suppliers during our onboarding process, regardless of the nature of product/service being provided, size of supplier or spend. Ameropa encourages and expects all our suppliers (existing and new) to establish and maintain appropriate standards to ensure alignment with the Code.

In the event of non-compliance and/or unwillingness to act ethically or uphold appropriate standards that align with the Code, Ameropa reserves the right to impose consequences upon suppliers which may affect Ameropa's ongoing relationship with the supplier and lead to termination of a supply contract.

2. Due Diligence Questionnaire

To support the Supplier Code of Conduct we developed a due diligence questionnaire (Questionnaire) to assist us to assess the potential modern slavery risks within our supply chain. Ameropa has worked closely with an external consultancy firm that specialises in providing due diligence activities, that amongst other things, relate to modern slavery. This consultancy firm continues to assist Ameropa in reviewing the Questionnaire responses received to identify 'gaps' in our suppliers' business procedures and confirm if the supplier aligns with Ameropa's ethical and responsible business approach.

Ameropa is currently focusing on the Questionnaire responses received from its suppliers categorised as high risk (1) and medium risk (32) to understand the reasons for the rating and if necessary to work collaboratively with these suppliers to implement appropriate actions to reduce risk of modern slavery in the supply chain.

3. Modern Slavery Module

Ameropa continues to assess and monitor its suppliers in relation to potential modern slavery risks. The consultancy firm we work with provides an online platform which we use to manage the distribution and assessment of the Questionnaire. The platform has been created in collaboration with an international law firm and provides a modern slavery risk assessment database and tools in which we consistently rely on.

The platform has an underlying formula enabling us to assess risks of modern slavery within our supply chain because of suppliers' responses to our Questionnaire. The platform utilises international databases, including the US Department of Labor List of Goods Produced by Child Labor or Forced

Labor, World Bank Governance Indicators, Global Slavery Index, and International Work Group for Indigenous Affairs. The Module enables us to risk rate our suppliers based on the following:

- Jurisdiction (country) of operations and headquarters
- Industry of supplier/industry of goods and services supplied
- Products attributed to high risk of modern slavery
- Workforce characteristics i.e. the utilisation of vulnerable workers
- Risk-mitigating measures specific to the individual supplier

The platform has a robust, real-time analytics engine, which means we will be able to focus our efforts on high-risk suppliers and benchmark our program's effectiveness on an annual basis. The platform continuously provides Ameropa with opportunities to report on the program via the analytics dashboard, providing a holistic picture of Ameropa's supply chain to relevant stakeholders without manually extracting and analysing the data.

4. Modern Slavery Policy

Our Modern Slavery Policy (**Policy**) is accessible on our intranet for our employees and contractors. The Policy is an enhancement to our existing framework and sets out clear expectations for team members, contractors, and other representatives. The Policy outlines our commitment to the highest levels of ethical behavior, including zero tolerance for unethical, corrupt, or undesirable conduct.

5. Internal Training and Awareness

Ameropa maintains a continuous focus on training and collaboration to improve awareness and knowledge amongst our team members. We are ensuring that all employees undertake specific training regarding modern slavery risk in business annually. Further to this, our onboarding training process involves specific modern slavery training to ensure all new employees and contractors are educated on the potential risks and the grievance procedure to report concerns.

We continue to develop our internal training program. As of current, the program for employees covers the fundamental governance principles which require adherence across all our business operations. The training and awareness program includes an overview of our Code of Conduct, grievance procedure and workplace ethics. This training is provided across the whole company. Each year our employees and contractors are required to refresh their knowledge of our Code of Conduct and Conflict of Interest Policies and confirm that they have done so, as a compliance activity.

6. Strengthening of contract clauses

We have continued to enhance our contractual clauses in procurement contracts to specifically cover modern slavery risks. This has involved reviewing contractual relationships and engaging with suppliers to improve and confirm that their practices and controls are adequate. Currently, Ameropa is including modern slavery clauses in its supply contracts to ensure our suppliers are aware of the importance Ameropa places on minimising the risk of modern slavery in its supply chain and to confirm it is collaboratively with organisations who share a similar objective.

Further to this, Ameropa has now included modern slavery acknowledgement clauses in its purchase order terms and conditions to ensure our suppliers target modern slavery risks within their own supply chain and assist in safeguarding the human rights of workers.

Risks of Modern Slavery Practices in our Operations and Supply Chains

Ameropa procures most of its supplies directly from Australian suppliers. Where Ameropa is unable to source supplies, such as fertiliser, from its Australian suppliers, Ameropa obtains these supplies from its Singaporean related entity, Ameropa Asia and several other overseas suppliers (some listed in the table below).

Due to Ameropa's direct suppliers (tier 1 suppliers) being predominantly based in Australia, the risk of modern slavery within this direct supply chain is considered low. Procuring supplies through Ameropa's Singaporean related entity inherently involves some modern slavery risk in Ameropa's indirect supply chain (tier 2 suppliers) as it is difficult to have complete transparency throughout a multi-tiered supply chain. Ameropa aims to prioritise risk management for these suppliers in the coming years.

In due course, Ameropa is aiming to conduct a review into its tier 2 supply chain to ensure that these suppliers align with Ameropa's ethical standards and assess any potential modern slavery risks. Ameropa is committed to protecting human rights throughout our entire supply chain. We manage our business and commercial relationships closely and therefore also understand that the likelihood of Ameropa directly contributing to modern slavery risks to be low.

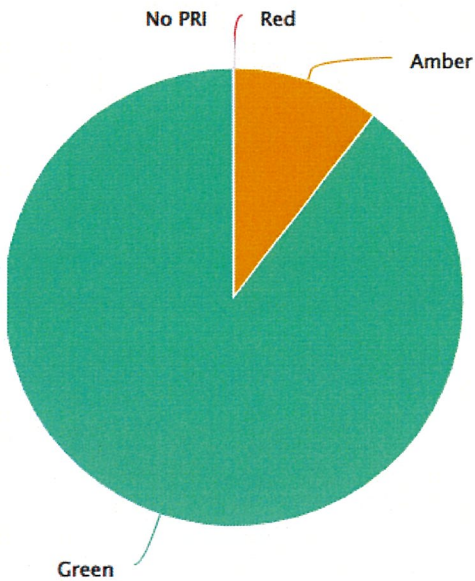
We have outlined the location of some of our top overseas key suppliers, the products, or services we source from these suppliers, whether directly or indirectly and our view of the possible modern slavery risks attached to those arrangements.

COUNTRY	RISK	EXAMPLE OF PRODUCT/ SERVICE	DIRECT OR INDIRECT SUPPLY
Argentina	Forced labour,	Boron	Direct dealing with Ameropa
Canada	Fair working conditions and training	Muriate of Potash	Direct dealing with Ameropa
China	Forced labour, Fair working conditions	Urea, Rock Phosphate, Ammonium Phosphates, Surveying, and Inspection services	Dealing via Ameropa Asia

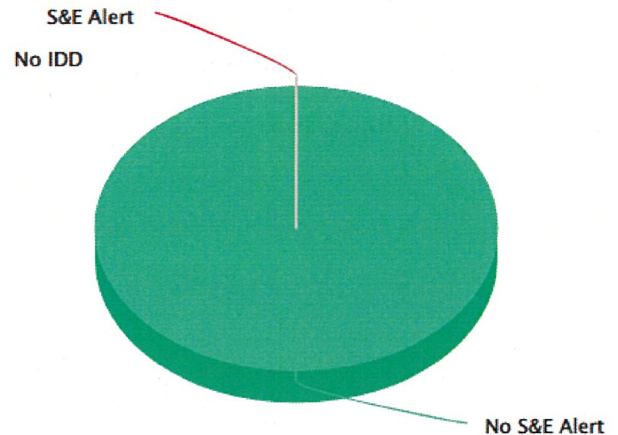
India	Migrant labour exploitation, Forced Labour	FIBC Packaging	Dealing with an Australian based Company, that sources from India
Indonesia	Migrant labour exploitation, bonded Labour,	Urea	Dealing via Ameropa Asia
Malaysia	Forced Labour, bonded labour, migrant labour exploitation	Urea	Dealing via Ameropa Asia
Saudi Arabia	Migrant labour exploitation, Forced Labour	Urea, Ammonium Phosphates, Sulphur	Dealing via Ameropa Asia
South Korea	Forced Labour	Sulphur	Dealing with an Australian based Company, that sources from South Korea
Taiwan	Forced Labour	Sulphate of Potash	Direct dealing with Ameropa
Togo	Migrant labour exploitation, Forced Labour	Rock Phosphate	Direct dealing with Ameropa

Third Party Risk Management Overview

Perceived Risk Indicator Results



Sanctions & Enforcements Results (IDD)



A total of 163 third parties were onboarded and checked in 2022. An assessment of the perceived risk indicator (**PRI**) of those suppliers revealed that 10% (16 suppliers) had a moderate PRI rating. The assessment involved an analysis into the potential modern slavery risks of the supplier. This is based on the industry of the product/service, supplier's location, and the supplier's public risk profile. The division of the PRI score is delegated as follows:

1. Industry Risk - contributed to 25% of the PRI (considered the complexity and visibility over the industry and the prevalence of modern slavery in the product/service procured);
2. Location Risk - contributed to 25% of the PRI (considered the modern slavery legislation or regulations of the geographic location and the importance certain countries place on protecting human rights); and
3. Public Risk Profile - contributed to 50% of the PRI (analysed publicly available data and confirmed whether certain suppliers had been in trouble with modern slavery in the past).

Ameropa will be working with our consultancy firm to review the data fed into the system and further analyse and moderate PRI results. Ameropa recognizes that these factors are important to consider when continuing a commercial relationship with certain suppliers to ensure that each stakeholder is working collaboratively to reduce the risk of modern slavery.

Total	In Progress	Completed	Not Started	Alternate End State
163	3 1.8%	131 80.4%	20 12.3 %	9 5.5%

Of the 163 suppliers requested to complete the Questionnaire only 12.3% (20 suppliers) have not done so. Ameropa will continue to follow up with these suppliers to ensure that they complete the Questionnaire. 9 suppliers provided us with documented evidence of their modern slavery policies and programs rather than responding to our Questionnaire.

The analysis conducted in the areas of jurisdiction, activity, workforce, policies, and systems and human rights demonstrated that 33 suppliers had been evaluated as having an overall medium risk of modern slavery in their supply chain. Of these 33 suppliers, only one supplier was evaluated as high risk.

Where Ameropa engages with suppliers who are assessed as having a higher level of vulnerability to modern slavery risk, Ameropa is seeking to undertake additional due diligence to ensure these risks are monitored. Ameropa continues to work to ensure it is aware of the risks in its supply chain and take appropriate action where necessary.

The actions we take to assess and address these risks

There are several actions in which Ameropa has taken during the 12-month reporting period to assess and address the risks of modern slavery in Ameropa's operations and supply chains.

1. Our Policies

Ameropa has a longstanding set of policies in place that contribute to reducing the risk of modern slavery. These policies are reviewed annually and promptly updated if necessary. Throughout this reporting period, Ameropa updated its Code of Conduct. In addition to Ameropa's Code of Conduct, our other policies include an Anti- Bribery and Corruption Policy, Whistleblower Policy, Discrimination, Harassment and Bullying Policy, Grievance Resolution Policy, and Counselling and Disciplinary Policy and Conflict of Interest Policy. As referred to above we now also have a specific Modern Slavery Policy. Collectively, these policies are referred to as our **Policies** in this statement.

These Policies ensure that our employees and suppliers are dedicated to managing social, ethical, and environmental issues in a responsible manner and consistent with our Company Values.

At Ameropa, we value education and transparency and each of our employees and suppliers is made aware of the expectation that they will be familiar with and comply with all relevant policies. Compliance education and training for employees includes signing off on the above policies on an annual basis.

We believe that strong internal policies and systems are a key aspect of how we manage and mitigate the risk of modern slavery in our operations and supply chains.

Modern Slavery Focus

Ameropa's Executive Leadership Team (ELT) has adopted a focused approach to modern slavery risks. In addition to the preparation of an Ameropa Modern Slavery Statement, the ELT is working to identify modern slavery risks in Ameropa operations and supply chain to finds ways to reduce or mitigate these risks, to develop programs, practices and procedures to enhance Ameropa's response to modern slavery, and to operate as a group of "thought leaders" for the organisation on the issue of modern slavery in a group that deals with farming, packaging and logistics suppliers.

Throughout this reporting period, the ELT has raised awareness of modern slavery risks and Ameropa's response to those risks through all areas of the Ameropa business, and this will include developing an employee education and compliance program as outlined in item 4 below.

2. Risk Mapping and Due Diligence

Ameropa has focused on suppliers with a spending threshold of over \$50,000 and sought the completion of the Questionnaire which is designed to determine the risk of modern slavery in suppliers' operations. Over the course of the 2022 FY, our appointed consultancy worked with us to receive responses from the 163 suppliers who received our questionnaire in December 2021.

Ameropa aims to conduct a further deep dive into the responses together with its external consultancy firm to ensure Ameropa's medium to high-risk suppliers uphold appropriate processes to address modern slavery concerns and safeguard human rights.

4. Employee Education and Compliance

Throughout this reporting period, Ameropa has taken steps to increase employee awareness and engagement regarding Modern Slavery and has developed a Modern Slavery Policy which is available to all employees on our intranet and through our employee education program, which forms part of the Ameropa Organisational Development Plan.

Ameropa has employee policies and procedures in place with respect to the hiring of employees, to ensure that slavery, forced labour and unethical hiring practices are not occurring in Ameropa's hiring process or employment relationships.

3. Industry discussions

In 2022, Ameropa continued its ongoing and active dialogue with several of its key suppliers and customers as well as Industry groups such as Fertiliser Australia and International Fertilizer Association (IFA) regarding the way the risk of modern slavery can be addressed and reduced.

4. Managing supplier contracts

In 2022 we were not made aware of any relevant breaches by any of our suppliers. However, if a supplier were to be found in breach of the terms stipulated in their contract with us in relation to modern slavery, we could suspend or terminate the contract with that supplier. We would take any breach involving a risk to human rights seriously and address it promptly with the ultimate outcome to reduce or remove the risk altogether.

The Objectives for 2023

The ELT has set out the below objectives that it intends to meet by the end of the 2023 financial year in addressing modern slavery risks.

Ameropa is committed to continued improvement and is taking the following actions to improve our own operations and supply chains.

1. Complete the supply chain risk mapping/ assessment

Ameropa is working towards engaging a further 73 suppliers who we contracted with in 2022, generally with a spend of over \$50,000 and request that they complete the Questionnaire. Once all the responses have been received and assessed, Ameropa will conduct a risk rating to establish if any further actions are to be taken. In 2023 we will continue the process of asking new suppliers which meet this threshold to complete the questionnaire.

Ameropa will then be able to have a broad perspective across its top suppliers and ensure that it has assessed all Ameropa's current top suppliers.

Ameropa is considering issuing the Questionnaire to suppliers with a spend between \$20,000 and \$50,000.

If, throughout this process, Ameropa discovers that a supplier is non-compliant with our Supplier Code of Conduct or does not present adequate measures to protect its own operations or supply chain from potential modern slavery risks, Ameropa will work with this supplier to take appropriate steps to remedy this issue. If this supplier demonstrates an unwillingness to address the issue, Ameropa will consider ceasing its commercial relationship with this supplier and replace this supplier with a supplier that presents a lower modern slavery risk and/or meets Ameropa's expectations regarding ethical behaviours.

2. **Continue training and awareness building**

Ameropa will continue to provide annual modern slavery training to its employees, contractors, and other relevant representatives. Ameropa is committed to spreading awareness and promoting transparency in relation to modern slavery within its organisation. We will continue to promote a strong consideration of modern slavery risks and the importance of minimizing them across our organisation to eventually eradicate the issue of modern slavery in supply chains.

3. **Work towards a deep dive into the indirect supply chain**

Ameropa continues to work closely with external experts to enhance its modern slavery due diligence. Ameropa's response to modern slavery risks develops and matures, we continue to endeavour to expand our focus to our indirect supply chain as soon as practicable. This will assist Ameropa in obtaining visibility across its broader supply group.

4. **Reporting concerns**

Ameropa promotes all individual concerns to be raised via our complaints and grievance process. Ameropa is committed to addressing any concerns and taking appropriate action where necessary.

This allows community members and other interested stakeholders, such as our suppliers, to raise issues directly with our local operations managers.

We respond to all complaints and grievances and aim to resolve any issue as soon as possible. We will also continue to send communications to all employees about modern slavery risks to increase awareness and inform them of the pathways available to them for reporting undesirable practices.

How we assess the effectiveness of the actions we take to address the risks of Modern Slavery

The effectiveness of the measures Ameropa takes to address the risks of Modern Slavery are assessed by Ameropa through the following means:

1. **Responsibility and accountability for modern slavery Issues** – the General Managers will work in conjunction with the ELT to monitor modern slavery concerns which arise. The ELT and the General Managers acknowledge that it their responsibility to assist in addressing modern slavery issues in Ameropa's operations and supply chain. If a concern is identified, Ameropa will ensure it implements steps to minimise any risk and assess the effectiveness of its actions taken.

To assist with this, the General Managers have been made aware of the suppliers currently assessed to be medium and high-risk suppliers and, if after our deep dive into those suppliers' responses they remain at the medium to high-risk status, General Managers will work in collaboration with the legal team to engage these suppliers and ensure appropriate procedures are in place across those organisations. The General Managers will report back

through to the ELT once effectiveness of actions taken by Ameropa have been assessed. The exact remediation that would be put in place would depend on the circumstances of the supplier but could include termination of its contract.

In 2023 we will be formally approaching the initial list of 163 suppliers and ask them to reconfirm their responses to the initial questionnaire of 2022 or advise of any updates to their responses in 2022 based on current circumstances. This will establish a regular review process which checks modern slavery risks of our suppliers and enables us to view how our suppliers are progressing in this field and enable a feedback opportunity with our suppliers. This will ensure that suppliers are regularly reminded of our expectations and their obligations.

2. **Supply chain mapping and risk assessment** continued in 2022. Building on this, the responses to our 2022 Questionnaire will enable us to identify areas of risk and enable us to consider improvements to our risk profile and identify areas of improvement and the possibility of engagement with medium and high-risk suppliers to minimise risks. Ameropa has recently adopted a new Risk Management Framework and is undertaking risk management training for the ELT and Senior Managers, which will assist in this process.
3. **Awareness:** through our Modern Slavery Policy, training, ongoing risk assessment, and other communications, we have established a strong awareness of modern slavery risks and the importance of minimizing them across our organisation. Ameropa continues to use these tools to improve its modern slavery processes and ensure all stakeholders in connection with Ameropa's services work collaboratively to address modern slavery risks and combat modern slavery entirely. **A complaint and grievance policy** is available to address modern slavery concerns. Assessments of the number and nature of any complaints and grievances will be conducted to determine the effectiveness of actions taken to address modern slavery risk.
4. We are continuously improving Ameropa's overall **risk assessment and mitigation process** which will encompass a response to the risks of modern slavery. Ameropa has recently adopted a new Risk Management Framework and is undertaking risk management training for the ELT and Senior Managers, which will assist in this process.

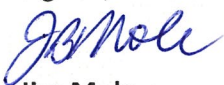
Consultation

Ameropa does not own or control any other entities therefore it did not consult with any other entities in the preparation of this statement.

Ameropa did however consult with a number of internal stakeholders across the business in the preparation of this statement, including to discuss the activities within such individual business units to better understand modern slavery risks and actions taken across the business.

This statement was approved by the Board of Ameropa.

Signed,



Jim Mole

Director, Ameropa Australia Pty Ltd